

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
VERONICA KAY HULINA : CHAPTER 13
Debtor. :

M&T BANK :
Movant, :
:
vs. :
VERONICA KAY HULINA : CASE NO. 5-19-00494
Respondents. :

**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362**

AND NOW COMES, Veronica Hulina, the Debtor, and files an Answer to M&T Bank's

Motion for Relief From the Automatic Stay:

1. Veronica Hulina (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Movant alleges that Debtor has failed to make post-petition mortgage payments.
3. Debtor fell behind on payments to the Movant.
4. The Debtor wishes to enter into a Stipulation to include the arrears in an amended Chapter 13 Plan.
5. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and/or a six (6) month Stipulation, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: September 13, 2021

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID# 59887
381 N. 9th Avenue
Scranton, PA 18504
(570) 347-7764

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on JulySeptember 13, 2021, he caused a true and correct copy of Debtor's Answer to M&T Bank's Motion for Relief from the Automatic Stay to be served Via First Class United States Mail, Postage Pre-paid in the above-referenced case, on the following:

Jack N. Zaharopoulos, Esq. at info@pamd13trustee.com

Rebecca Solarz, Esq. at rsolarz@kmlawgroup.com

Dated: September 13, 2021

/s/Tullio DeLuca
Tullio DeLuca, Esquire